

EXHIBIT B

A FEDERAL COURT ORDERED THIS NOTICE.

NOTICE OF CLASS ACTION SETTLEMENT

YOU ARE RECEIVING THIS NOTICE BECAUSE YOU HAVE BEEN THE SUBJECT OF A CONSUMER REPORT PREPARED BY EBACKGROUNDCHECKS.COM, INC. AND YOU MAY BE ELIGIBLE FOR BENEFITS FROM A CLASS ACTION SETTLEMENT.

For more information, or to receive a more detailed notice of the settlement, call toll free (855) 770-0005, visit www.bgcthomassettlement.com or write to:

**Thomas v. Backgroundchecks.com Settlement
c/o Settlement Administrator
P.O. Box 1607
Blue Bell, PA 19422**

1. WHAT IS THIS ABOUT?

A settlement has been proposed in a class action lawsuit under the Fair Credit Reporting Act (“FCRA”). The lawsuit was brought against e-backgroundchecks.com, Inc. (“BGC”) and claims that BGC violated the FCRA by producing consumer reports without providing required notice to consumers and by producing consumer reports containing inaccurate information. The Court did not decide which side is right. Instead, the Plaintiff and BGC agreed to settle all of the claims in the lawsuit and resolve the case.

You have received this notice because you may be a “Class Member”, that is: a person residing in the United States who was the subject of one or more consumer reports that BGC prepared and furnished directly to an end-user for its employment purposes during the period from January 11, 2011 to August 31, 2014, which report or reports contained one or more criminal offense records, where BGC neither (a) sent you a notice under the FCRA nor (b) obtained the records from or confirmed the records with a government body after receiving the request for the report and before furnishing the report.

The Settlement establishes an \$18 million Settlement Fund to pay Settlement Class Members, administrative costs for the settlement, an individual service award to the Plaintiff, and attorneys’ fees and costs. The Settlement also establishes procedure changes to better protect individuals when criminal record information is reported about them, provides Settlement Class Members free copies of their historical and current criminal history information as maintained by BGC, and provides an expedited dispute procedure.

THESE ARE YOUR LEGAL RIGHTS AND OPTIONS:	
DO NOTHING	You will remain a Settlement Class Member, be bound by the Settlement, including the release of claims described below, but you will not receive any money. You may benefit from the changes to Defendant's procedures.
FILE A CLAIM FOR A CASH PAYMENT (OPTION ONE)	<p><i>You can submit a claim for damages</i> resulting from information disclosed in your criminal background report. Your completed Claim Form must be filed at postmarked on or before August 28, 2015. If your claim is approved by the Settlement Administrator, and the Court approves the Settlement, you will receive a check from the Settlement Fund. The amount of the check depends on the number of persons who submit valid Claim Forms. A Claim Form is attached. Mail it to:</p> <p style="text-align: center;">Thomas v. Backgroundchecks.com Settlement c/o Settlement Administrator P.O. Box 1607 Blue Bell, PA 19422</p>
OR RESERVE AN ACTUAL DAMAGES CLAIM (OPTION TWO)	<p>If you want to file a lawsuit on your own and without the assistance of lawyers in this case for your actual damages that you believe are substantial, <i>instead of filing a claim, you can chose to send a reservation of damages form</i> to the Settlement Administrator to reserve your right to sue for actual damages. You may not submit a claim and still reserve your actual damages. If you elect to submit a completed Limited Claim Reservation Form, a form is attached and must be postmarked on or before July 16, 2015. Mail it to:</p> <p style="text-align: center;">Thomas v. Backgroundchecks.com Settlement c/o Settlement Administrator P.O. Box 1607 Blue Bell, PA 19422</p>
REQUEST YOUR PREVIOUS AND CURRENT BACKGROUND CHECK REPORT	BGC has also agreed to provide each Settlement Class Member, on request, with (1) each report reflecting the criminal history information provided to an employer (available until July 31, 2015) and (2) a copy of the information BGC currently has in its files about the Settlement Class Member's criminal history (available if and when the Court approves the Settlement). BGC has also agreed to establish an expedited procedure for Settlement Class Members to dispute the information in their current criminal history.
EXCLUDE YOURSELF ENTIRELY	You can remove yourself from participation in this class action and not receive a benefit from this Settlement. However, you will retain any right to file a separate lawsuit against the Defendant. Your request to opt out of the settlement must be postmarked on or before July 16, 2015.

You can remain a Settlement Class Member, but write to the Court and explain why you don't think the settlement is fair, reasonable, or adequate. This is called an objection. You must file your objection with the Court by July 16, 2015.

2. HOW DO I MAKE A CLAIM FOR A CASH PAYMENT?

You may make a claim for cash payment only if you suffered injury because BGC furnished an inaccurate background check about you.

You have to act to receive a payment from the Settlement Fund. These payments will be available only if the Court approves the Settlement. THE CLAIM FORM IS ATTACHED TO THIS NOTICE and must be completed and mailed by August 28, 2015.

The amount paid under either of the foregoing will depend on how many people submit approved claims. The Settlement provides for cash payments if you can attest under oath to one of two things:

- (A) **Submit a claim for “Stated Injury”.** You may submit a claim that you suffered reputational injury as a result of the BGC background check report. While you are not required to provide details as to the injury that you suffered, you must state under oath that the report contained inaccurate information.

OR

- (B) **Submit a claim for “Substantiated Injury.”** You may submit a claim that you suffered injury as a result of the BGC background check report and provide details under oath to explain how your suffered injury as a result of the BGC background check report. At a minimum you must state the name of the employer regarding whom you suffered the injury and some explanation of how the report was inaccurate. **The Settlement will provide a larger payment for these claims than for the “Stated Injury” claims in number (1) above.**

3. WHAT ELSE WILL I GET IF THE SETTLEMENT IS APPROVED?

- (A) **YOU MAY REQUEST A FREE COPY OF THE BACKGROUND CHECK BGC PROVIDED TO YOUR POTENTIAL EMPLOYER.**

To request historical or current reports, or to dispute any information, you will need your Individual Settlement Code(s): [codes].

- You may request a free copy of the criminal history information BGC furnished to your employer or potential employer at [BGC website]. If you do not have access to the internet, you may contact the Class Administrator toll free at (855) 770-0005 for assistance. These reports will be available only until July 31, 2015.
- (B) **YOU MAY ALSO REQUEST A CURRENT COPY OF THE BACKGROUND CHECK BGC PROVIDED TO YOUR POTENTIAL EMPLOYER.**
- If and when the Settlement is approved, you may request a free copy of your current criminal history information at [BGC website]. If you do not have access to the internet, you may contact the Class Administrator toll free at (855) 770-0005 for assistance.
- (C) **YOU MAY ALSO REQUEST AN EXPEDITED DISPUTE OF INACCURATE OR INCOMPLETE INFORMATION IN YOUR REPORT.**
- A toll free number will be available if and when the Court approves the Settlement for you to request an expedited investigation of potentially inaccurate information in your file. The expedited dispute procedure will also be available by facsimile, e-mail, or mail. You will be provided with this contact information at approximately the same time you receive your current criminal history report.

(D) BGC HAS AGREED TO MAKE SUBSTANTIAL CHANGES TO ITS PRACTICES FOR FURNISHING BACKGROUND CHECKS.

BGC has agreed to make changes to its practices for furnishing criminal history information. The details of such changes are found at www.bgcthomassettlement.com. You may also call the Settlement Administrator toll free at (855) 770-0005 to request a complete copy of the Settlement Agreement.

4. WHAT AM I GIVING UP TO GET A BENEFIT OR STAY IN THE SETTLEMENT CLASS?

Unless you exclude yourself, you are staying in the Settlement Class, which means that you cannot be part of any other lawsuit against the Defendant (or other parties released by the settlement) about the legal claims in this case and legal claims that could have been brought in this case. It also means that all of the Court's orders will apply to you and legally bind you. If you do not exclude yourself from the Settlement Class, you will agree to a "Release of Claims," which is set forth in the Settlement Agreement. Basically, you are releasing your right to individually sue for any violation of federal or state law based on the Defendant's reporting criminal information to employers.

If you want to remain in the Settlement Class and receive benefits from this Settlement, but you also want to reserve your right to sue the Defendant on your own solely for any actual damages relating to inaccuracies in your criminal background report(s) or your dispute of your criminal background report(s), you may send in a Limited Claim Reservation Form (discussed in the next section). This gives you the right to bring your own lawsuit for actual damages but precludes you from participating in the Settlement Fund, and you will not receive any payments from the Settlement Fund. You will be able to pursue only an individual claim (not a class or mass claim) and you will not be able to pursue claims for statutory damages or punitive damages. The Defendant will be able to assert defenses to any such lawsuit, and you may not recover anything.

5. HOW CAN I RESERVE A CLAIM FOR ACTUAL DAMAGES?

INSTEAD OF FILING A CLAIM, If You Have Actual Damages that You Believe are Substantial, You May Chose to Send a Limited Claim Reservation Form to Reserve Your Right to Sue for Actual Damages.

You may not submit a claim and still reserve your actual damages.

THE LIMITED CLAIM RESERVATION FORM IS ATTACHED TO THIS NOTICE. The deadline to mail that form to the Settlement Administrator is July 16, 2015. If you chose to reserve your actual damage claim, you will be allowed to and need to pursue that claim on your own and outside of this case.

6. HOW CAN I OPT-OUT OF OR OBJECT TO THE SETTLEMENT?

You can remove yourself from participation in this class action and not receive a benefit from this Settlement. However, you will retain any right to file a separate lawsuit against the Defendant. Your request to opt out of the settlement must be postmarked on or before July 16, 2015.

You can remain a Settlement Class Member, but write to the Court and explain why you don't think the settlement is fair, reasonable, or adequate. This is called an objection. You must file your objection by July 16, 2015.

ADDITIONAL INFORMATION ABOUT THE LAWSUIT, THE SETTLEMENT, AND YOUR RIGHTS AND OBLIGATIONS CAN BE FOUND AT www.bgcthomassettlement.com.

If you do not have access to a computer or have additional questions, you can call toll free (855) 770-0005 or write to the Settlement Administrator:

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